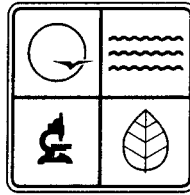


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION

PERMIT BOOK



PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **05 2 0 0 6 - 0 1 8** Project Number: 2006-02-065
213-P040
Owner: Leo Journagan Construction Company
Owner's Address: 3003 East Chestnut Expressway, Suite 1200, Springfield, MO 65802
Installation Name: Leo Journagan Construction Company
Installation Address: 719 Cedar Valley Road, Hollister, MO 65672
Location Information: Taney County, S30, T22N, R21W

Application for Authority to Construct was made for:

The modification of an existing asphalt plant. Asphalt is produced through a Drum Mix Dryer. The asphalt plant has a maximum hourly design rate (MHDR) of 325 tons per hour (tph). Best Management Practices will be used to control fugitive emissions from haul roads and vehicular activity areas. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- ☐ Standard Conditions (on reverse) are applicable to this permit.
- ☒ Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

MAY 24 2006

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

2006-02-065
213-P040

Leo Journagan Construction Company

3003 East Chestnut Expressway, Suite 1200, Springfield, MO 65802

Leo Journagan Construction Company

719 Cedar Valley Road, Hollister, MO 65672

Taney County, S30, T22N, R21W

The modification of an existing asphalt plant. Asphalt is produced through a Drum Mix Dryer. The asphalt plant has a maximum hourly design rate (MHDR) of 325 tons per hour (tph). Best Management Practices will be used to control fugitive emissions from haul roads and vehicular activity areas. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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Permit No.	
Project No.	2006-02-065

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075); by the Missouri Rules listed in Title 10, Division 10 of the Codes of State Regulations (specifically 10 CSR 10-6.060); by 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority"; by 10 CSR 10-6.010 "Ambient Air Quality Standards" and 10 CSR 10-6.060 subsections (5)(D) and (6)(A); and by control measures requested by the applicant, in their permit application, to reduce the amount of air pollutants being emitted, in accordance with 10 CSR 10-6.060 paragraph (6)(E)3. Furthermore, one or more of the Subparts of 40 CFR Part 60, New Source Performance Standards (NSPS), applies to this installation.

1. **Best Management Practices**
Leo Journagan Construction Company shall control fugitive emissions from all of the haul roads and stockpiles at this site by performing *Best Management Practices*, which include the usage of paving, chemical dust suppressants, or documented watering. These practices are defined in Attachment AA.
2. **National Ambient Air Quality Standards (NAAQS) Limitation for Particulate Matter Less Than Ten Microns in Diameter (PM₁₀)**
 - A. The operator(s) for Leo Journagan Construction Company's asphalt plant (213-P040) shall ensure, while operating at this site, that the ambient impact of PM₁₀ at or beyond the nearest property boundary does not exceed 150 µg/m³ in any 24-hour period, in accordance with the Federal NAAQS requirements (40 CFR 50.6).
 - B. The total daily ambient impact of PM₁₀ at this site shall include the combined impact of the asphalt plant and any ambient background concentration from installations or equipment located on the same site as the asphalt plant.
 - C. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed. Attachment A, *Daily Ambient PM₁₀ Impact Tracking Record*, or other equivalent form(s), will be used for this purpose.
3. **Annual Emission Limit of Nitrogen Oxides (NO_x)**
 - A. The operator(s) shall ensure that Leo Journagan Construction Company's asphalt plant emits less than 40 tons of NO_x into the atmosphere in any 12-month period.
 - B. To demonstrate compliance, the operator(s) shall maintain a daily record of material processed and NO_x. Attachment B, *Monthly Nitrogen Oxides (NO_x) Emissions Tracking Record*, or other equivalent form(s), will be used for this purpose.
4. **Moisture Content Testing of Storage Piles Requirement**
 - A. The moisture content of the stockpiled rock will reduce particulate emissions. Leo Journagan Construction Company claimed the moisture content of the stored rock to be greater than or equal to 1.5 wt.%, which shall be verified by testing.
 - B. Testing shall be conducted according to approved methods, such as those prescribed by the *American Society for Testing Materials (ASTM D-2216 or C-566)*, EPA AP-42 Appendix C.2, or other method(s) approved by the Director.
 - C. The operator may obtain a copy of the test results of the inherent moisture content from the supplier(s) of the aggregate. Otherwise, the operator shall obtain test samples from each source of untested aggregate. The written analytical report shall include the raw data and moisture content (wt.%) of each sample, the test date, and the original signature of the individual performing the test. Within 30 days of completion of the required tests, the report shall be submitted to the Enforcement section of the Air Pollution Control Program, and a copy shall be sent to the Regional Office.
 - D. If the moisture content result of the first test is less than 1.5 wt.%, a second test must be performed within 30 days. If the result of the second test is less than 1.5 wt.%, Leo Journagan Construction Company shall apply for a new construction permit to account for the revised information or install wet spray devices on the affected units.
5. **Baghouse(s) Control System Requirements**
 - A. Leo Journagan Construction Company shall install and operate baghouse(s) to restrict the emission of particulate matter. The baghouse(s) must be used whenever these units are in operation. The

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Project No.	2006-02-065

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- baghouse(s) shall be installed on the following units: Drum Dryer.
 - B. The Leo Journagan Construction Company shall install instruments to monitor the operating pressure drop across the baghouse. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's preventive maintenance recommendations. The operator(s) shall check and record the pressure drop across the baghouse filter once per operating day during silo loading. The baghouse operating pressure drop shall be according to manufacturer's specifications.
 - C. The operator(s) shall conduct and document a quarterly inspection and maintenance of the baghouse for structural component failures, for leaks and wear, and for the cleaning sequence of the baghouse. Replacement bags shall be kept on hand at all times to replace defective bags (The bags shall be made of fibers appropriate for the operating conditions expected to occur). All inspections, corrective actions, and instrument calibrations shall be recorded.
6. Performance Testing for New Source Performance Standards (NSPS)
 - A. Leo Journagan Construction Company shall submit the enclosed testing plan to the Enforcement section of the Air Pollution Control Program for all equipment applicable to NSPS Subpart "I". Leo Journagan Construction Company shall contact the Enforcement section to obtain all requirements for testing, and the plan must be submitted to the Enforcement section at least 30 days prior to the proposed test date.
 - B. Testing must be performed no later than 60 days after achieving the maximum production rate of the process, and in any case no later than 180 days after initial startup. Testing shall be performed at no less than 90% of the maximum production rate. The performance test results shall be submitted to the Enforcement section no later than 30 days after completion of any required testing.
7. Compliance Testing Requirements
 - A. Leo Journagan Construction Company's asphalt plant shall conduct stack testing to demonstrate compliance with emission limit of 7.39 pounds of PM₁₀ per hour. If the company chooses to use EPA method 5, or any other method that tests solely for particulate matter (PM) emissions, then all PM emissions shall be regarded as PM₁₀ emissions, and the stack test shall demonstrate that the plant will not emit more than 7.39 pounds of PM per hour. If the emissions from the plant exceed those levels, then Leo Journagan Construction Company shall apply for a new construction permit to account for the new emission rate.
 - B. Leo Journagan Construction Company's asphalt plant shall submit the enclosed testing plan to the Enforcement section of the Air Pollution Control Program. The asphalt plant shall contact the Enforcement section to obtain all requirements for testing, and the plan must be submitted to the Enforcement section at least 30 days prior to the proposed test date.
 - C. Testing must be performed no later than 60 days after achieving the maximum production rate of the process, and in any case no later than 180 days after initial startup. Testing shall be performed at no less than 90% of the maximum production rate. The performance test results shall be submitted to the Enforcement section no later than 30 days after the completion of any required testing.
 - D. Testing shall demonstrate compliance with Subpart "I", *Standards of Performance for Hot Mix Asphalt Facilities*, of the New Source Performance Standards (NSPS).
 - E. Two (2) copies of a written report of the performance test results shall be submitted to the Air Pollution Control Program within 30 days of completion of any required testing. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required Environmental Protection Agency (EPA) method for at least one (1) sample run.
8. Restriction on the Use of Diesel Engine(s)
Leo Journagan Construction Company shall only operate the diesel engine(s) while the plant is running.
9. Prohibition Against Concurrent Operations Without Further Air Pollution Control Program Review
The asphalt plant (213-P040) is prohibited from operating whenever any other plant(s) are located at this site, except for the following two (2) plants:

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Permit No.	
Project No.	2006-02-065

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- A. Leo Journagan Construction Company's stationary rock-crushing plant, 213-P040, (Project #2006-03-014).
 - B. Regional Ready Mix's stationary concrete plant, 213-0053, (Project #2006-02-066).
10. **Restriction on Minimum Distance to Nearest Property Boundary**
The primary emission point of the asphalt plant, which is the stack of the drum mix dryer, shall be located at least 1350 feet from the nearest property boundary whenever it is operating at this site.
 11. **Record Keeping Requirement**
The operator(s) shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 12. **Reporting Requirement**
The operator(s) shall report to the Air Pollution Control Program (APCP) Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedances of the limitations imposed by this permit.
 13. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit(s) (0590-008, 072004-026) from the Air Pollution Control Program.

TECHNICAL REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT

PROJECT DESCRIPTION

For permitting purposes, the asphalt plant has historically had a maximum hourly design rate (MHDR) of 225 tons per hour (tph). This number was based a performance test conducted in compliance with 40 CFR Part 60 Subpart I, *Standards of Performance for Hot Mix Asphalt Facilities*, with a wet scrubber as the primary control equipment. Since the time of testing, Leo Journagan Construction Company has replaced the wet scrubber with a high efficiency baghouse, and the company believes that, with the installation of the new baghouse and other system improvements, the plant will be able to produce at an MHDR of 325 tph. Therefore, Leo Journagan Construction Company has requested to increase the MHDR of the plant in its permit. Also, the previous permit for the asphalt plant (#072004-026) allowed only one concurrently operating plant. Leo Journagan Construction Company would like the permit for the asphalt plant to allow for two concurrently operating plants: Regional Ready Mix's stationary concrete plant, 213-0053, (Project #2006-02-066) and Leo Journagan Construction Company's stationary rock-crushing plant, 213-P040, (Project #2006-03-014).

Hot Mix Asphalt (HMA) is composed of non-metallic aggregate, sand, mineral filler and other materials with liquid asphaltic cement. These materials are mixed and heated/dried in the drum dryer. Processed HMA is delivered as sellable product. This permit allows the plant to use a 1200 horsepower diesel engine and an asphalt heater with a maximum hourly design rate (MDHR) of 10 gallons of fuel per hour. This plant was formerly a portable asphalt plant (PORT-0015) and was converted to a stationary plant in 2003 with the issuance of permit #072004-026 (Project #2004-04-130). Best Management Practices will be used at the site to control fugitive emissions from haul roads and vehicular activity areas. The emission points are listed in the attached spreadsheet summary. This installation is classified under the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2, Item 27]. The installation is located in Taney County, an attainment area for all criteria air pollutants.

Table 1. Other Permits Issued for Site 213-P040

Permit Number	Completed	Description
0590-008	5/18/1990	Section 5 permit.
072004-026	6/26/2004	Section 6 permit.

An NOV (#403JA13) was issued to the plant in 2003 in violation of 10 CSR 10-6.065 *Operating Permits*.

EMISSIONS EVALUATION

Criteria air pollutants will be emitted from this operation. The main air pollutants of concern are PM₁₀ and Nitrogen Oxides (NOx). The potential emissions were calculated from the maximum hourly design rate (MHDR) of the equipment, appropriate emission factors, control device efficiencies, and the limiting operating hours at MHDR. The sources of the emission factors and control efficiencies are listed in the section "Permit Documents". Based on the conditioned potential emissions, the operation is considered a minor source under 10 CSR 10-6.060 section (6).

Leo Journagan Construction Company claimed that its baghouse on the drum dryer can achieve a control efficiency of 99.65% in controlling PM₁₀. The default value used by the Air Pollution Control Program is 99.00 % and the company must conduct stack tests to prove that higher efficiency can be achieved. With a control efficiency of 99.65%, it is estimated that the plant will emit less than 7.39 lbs/hr of PM₁₀. Leo Journagan Construction Company shall conduct stack tests to verify that the PM₁₀ emissions from the plant will be less than 7.39 lbs/hr. If, EPA method 5, or any other method that tests solely for particulate matter (PM), is used for compliance verification, then all particulate matter emitted shall be regarded as PM₁₀, and the stack test shall verify that PM emissions is less than 7.39 lbs/hr.

The permit allows the plant to use a 1200 horsepower diesel engine and an asphalt heater with an MHDR of ten (10) gallons of fuel per hour. For the emissions evaluation, an efficiency of 35% was assumed for the diesel engine. The plant has a potential to emit of NOx over the de minimis level (40 tons). The company has the option of either submitting the stack parameter for the diesel engine and asphalt heater or hold the NOx emissions under 40 tons per year. The company elected to hold NOx under 40 tons in any 12-month period. A composite NOx emission factor was developed for the asphalt plant, and it is incorporated into the monthly record keeping table, Attachment B. The company indicated that the asphalt heater may operate while the plant is not in operation. Therefore, NOx emissions from the asphalt heater cannot be tracked using the emission factor and

production rates. The NO_x emissions from the asphalt heater is included in Attachment B as the background emissions under the assumption that the heater will operate 24 hours per day during the year. If the conditioned potential emissions of NO_x were 100 tons per year or greater, then the operation would be considered a major source under 10 CSR 10-6.060 section (7) or (8).

Table 2: Emissions Summary (tons per year)

Air Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2003 EIQ)	Potential Emissions of the Application	*New Installation Conditioned Potential	Emission Factor (lb/ton)
PM ₁₀	15.0	49.27	3.97	49.27	49.30	N/A
SO _x	40.0	38.52	0.26	38.52	10.08	N/A
NO _x	40.0	204.07	1.12	204.07	<40.00	0.1427
VOC	40.0	48.76	0.61	48.76	9.57	N/A
CO	100.0	218.45	0.70	218.45	43.00	N/A
HAPs	10.0/25.0	5.64	N/A	5.64	1.11	N/A

Note: N/A = Not Applicable

* PM₁₀ conditioned potential based on daily production limit from ambient impact analysis. NO_x conditioned potential based on limit in permit conditions. Other pollutants proportionately reduced based on NO_x limit and the asphalt heater operating 24 hours per day during the year.

AMBIENT AIR QUALITY IMPACT ANALYSIS

Screening tools were used to evaluate the ambient air impact of the hourly emissions from this operation. The ambient impact was evaluated at a distance of 1350 feet to the nearest property boundary. The ambient impact at this site shall not exceed the National Ambient Air Quality Standard (NAAQS) of 150 µg/m³ of PM₁₀ at or beyond the nearest property boundary in any single 24-hour period. The screening tools were used to develop an ambient impact factor for the asphalt plant. This ambient impact factor is incorporated into the daily record keeping table, Attachment A. The stationary asphalt plant is permitted to operate with two other plants at this site: Leo Journagan Construction Company's stationary rock-crushing plant, 213-P040, (Project #2006-03-014), and Regional Ready Mix Inc.'s stationary concrete plant, 213-0053, (Project #2006-02-066). An ambient impact factor from the operation of Leo Journagan Construction Company's stationary rock-crushing plant and An ambient background level of PM₁₀ from the operation(s) of Regional Ready Mix Inc.'s stationary concrete plant are included in Attachment A.

For sources agreeing to use Best Management Practices (BMPs), as defined in Attachment AA, haul roads and stockpiles are not modeled with screening tools. Instead, they are addressed as a background level of 20 µg/m³ of PM₁₀. To ensure conformity with NAAQS, the remaining process emissions are limited to an impact of less than 130 µg/m³ of PM₁₀ at or beyond the nearest property boundary.

Table 3: Ambient Air Quality Impact Analysis of PM₁₀, 24-Hour Averaging Time

Operation	Ambient Impact Factor (µg/m ³ /ton)	Modeled Impact (µg/m ³)	*Background (µg/m ³)	NAAQS (µg/m ³)	Daily Production Limit (tons)
1. Solitary Stationary Asphalt Plant Stationary Rock-Crushing Plant	0.0064 0.0192	**	32.2	150.00	**

* Background PM₁₀ level of 20.00 µg/m³ from haul roads and stockpiles and 12.2 µg/m³ from the operation of Regional Ready Mix Inc.'s stationary concrete plant, 213-0053, Project #2006-02-066.

** The operator(s) must balance production among concurrently operating plants, with the ambient impact factors for each, such that NAAQS is not exceeded.

APPLICABLE REQUIREMENTS

The owner is subject to compliance with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Operating Permits*, 10 CSR 10-6.065
- An Operating Permit application is required for this installation within 30 days of equipment startup.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090
- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- 40 CFR Part 60 Subpart "I", *Standards of Performance for Hot Mix Asphalt Facilities*, of the New Source Performance Standards (NSPS)
- The National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the currently promulgated Maximum Achievable Control Technology (MACT) regulations do not apply to the proposed equipment.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Chia-Wei Young
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, designating Leo Journagan Construction Company as the owner and operator of the installation.
- Environmental Protection Agency (EPA) AP-42, *Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition*.
- Noyes Data Corp. book, Orlemann, et al.1983, *Fugitive Dust Control*.
- EPA Factor Information Retrieval (FIRE) Version 6.21.
- Spreadsheet calculations of potential-to-emit and ambient impact.
- Southwest Regional Office Site Survey.
- Best Management Practices.

Attachment A: Daily Ambient PM₁₀ Impact Tracking Record
Leo Journagan Construction Company, 213-P040 – Asphalt Plant

Project Number: 2006-02-065
County, CSTR: Taney County (S30, T22N, R21W)
Primary Unit Size: 325 tph
Distance to Nearest Property Boundary: 1350 feet

This sheet covers the period from _____ to _____ (Month, Day, Year) (Copy this sheet as needed.)

[illegible]

Note 1: The Daily PM₁₀ Impact (µg/m³) for each plant is calculated by multiplying the Daily Production (tons) by the matching Ambient Impact Factor.

Note 2: Background PM₁₀ Level (µg/m³) is from Haul Roads and Stockpiles **AND** from Regional Ready Mix Inc.'s stationary concrete plant, 213-0053, Project #2006-02-066.

Note 3: The TOTAL PM₁₀ Level (µg/m³) is calculated by summing the Daily PM₁₀ Ambient Impact(s) and the Background PM₁₀ Level. A TOTAL PM₁₀ Level of less than 150 µg/m³ in any 24-hour period indicates compliance.

Attachment B: Monthly Nitrogen Oxides (NOx) Emissions Tracking Record
Leo Journagan Construction Company, 213-P040 – Asphalt Plant

Project Number: 2006-02-065
County, CSTR: Taney County (S30, T22N, R21W)
Primary Unit Size: 325 tph
Distance to Nearest Property Boundary: 1350 feet

This sheet covers the period from _____ to _____ (Month, Day, Year)
(Copy this sheet as needed.)

[illegible]

Note 1: The Monthly Emissions (lbs) are calculated by multiplying the Monthly Production (tons) by the Composite Emission Factor (lbs/ton).

Note 2: The Monthly Emissions (tons) are calculated by dividing the Monthly Emissions (lbs) by 2,000.

Note 3 The Monthly NOx background emissions is from the operation of the asphalt heater.

Note 4: The Total Monthly Emissions are calculated by adding the Monthly Background Emissions (tons) to the Monthly Emissions (tons).

Note 5: The 12-Month Emissions (tons/year) are a rolling total calculated by adding the Month's Total Emissions (tons) to the Total Monthly Emissions (tons) of the previous eleven (11) months. A total of less than **40** tons in any consecutive 12-month period indicates compliance.

Attachment AA: Best Management Practices (BMPs)- Construction Industry Fugitive Emissions

Construction Industry Sites covered by the Interim Relief Policy shall maintain Best Management Control Practices (BMPs) for fugitive emission areas at their installations when in operation. Options for BMPs are at least one of the following:

For Haul Roads:

1. Pavement of Road Surfaces –
 - A. The operator(s) may pave all or any portion of the haul roads with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve “Control of Fugitive Emissions¹” while the plant is operating.
 - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the haul road(s) as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
2. Usage of Chemical Dust Suppressants –
 - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the unpaved portions of the haul roads. The suppressant will be applied in accordance with the manufacturer’s suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
 - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
3. Usage of Documented Watering –
 - A. The operator(s) shall control the fugitive emissions from all the unpaved portions of the haul roads at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating. For example, the operator(s) shall calculate the total square feet of unpaved vehicle activity area requiring control on any particular day, divide that product by 1,000, and multiply the quotient by 100 gallons for that day.
 - B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operation (e.g., meteorological situations, precipitation events, freezing, etc.)
 - C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
 - D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
 - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

¹ For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)

For Vehicle Activity Areas around Open Storage Piles:

1. Pavement of Stockpile Vehicle Activity Surfaces –
 - A. The operator(s) may pave all or any portion of the vehicle activity areas around the storage piles with materials such as asphalt, concrete, and/or other material(s) after receiving approval from the program. The pavement will be applied in accordance with industry standards for such pavement so as to achieve control of fugitive emissions while the plant is operating.
 - B. Maintenance and/or repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator(s) shall periodically water, wash and/or otherwise clean all of the paved portions of the vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
2. Usage of Chemical Dust Suppressants –
 - A. The operator(s) shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to all the vehicle activity areas around the open storage piles. The suppressant will be applied in accordance with the manufacturer's suggested application rate (if available) and re-applied as necessary to achieve control of fugitive emissions from these areas while the plant is operating.
 - B. The quantities of the chemical dust suppressant shall be applied, re-applied and/or maintained sufficient to achieve control of fugitive emissions from these areas while the plant is operating.
 - C. The operator(s) shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.
3. Usage of Documented Watering –
 - A. The operator(s) shall control the fugitive emissions from all the vehicle activity areas around the storage piles at the installation by consistently and correctly using the application of a water spray. Documented watering will be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of vehicle activity areas around the storage piles as necessary to achieve control of fugitive emissions from these areas while the plant is operating. (Refer to example for documented watering of haul roads.)
 - B. The operator(s) shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the plant is in operations (e.g., meteorological situations, precipitation events, freezing, etc.)
 - C. Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or condition to achieve control of fugitive emissions from these areas while the plant is operating.
 - D. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. The operator(s) shall record a brief description of such events in the same log as the documented watering.
 - E. The operator(s) shall record the date and the amount of water applied for each application on the above areas. The operator(s) shall keep these records with the plant for not less than five (5) years, and the operator(s) shall make these records available to Department of Natural Resources personnel upon request.

Mr. John A. View III
Vice President
Leo Journagan Construction Company
3003 East Chestnut Expressway, Suite 1200
Springfield, MO 65802

RE: New Source Review Permit - Project Number: 2006-02-065

Dear Mr. View III:

Enclosed with this letter is your New Source Review permit. Please review your permit carefully and note the special conditions, if any, and the requirements in your permit.

Operation in accordance with the conditions and requirements in your permit, the New Source Review application submitted for project 2006-02-065, and your amended operating permit, if required, is necessary for continued compliance. Please review your amended operating permit, as it will contain all applicable requirements for your asphalt plant, including any special conditions from your New Source Review permit.

The section of the permit entitled "Technical Review of Application for Authority to Construct" should not be separated from the main portion of your permit. The entire permit must be retained in your files. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall Hale, P.E.
New Source Review Unit Chief

KH:cwyl

Enclosures

c: Southwest Regional Office
PAMS File: 2006-02-065
Permit Number: